

Docusign Envelope ID: 74502B72-C337-4ED1-9566-695BA829EAEC



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

Peter Harris and Loni Harris,

Plaintiffs,

v.

Upwintrade.com, a business
association; David Shamlan, an
individual; John Does 1 – 20,

Defendants.

Case No. 1:24-cv-00313

**Declaration of
Loni Harris**

I, Loni Harris, state and swear as follows.

I. Introduction

1. My name is Loni Harris. I am of sound mind and capable of making this Affidavit. I have personal knowledge of the facts stated herein.

2. I am one of the plaintiffs in this matter, along with my husband, Peter Harris. I am submitting this Declaration in support of our Motion for Preliminary Injunction.

II. Chronology & Evidence

3. My first contact with the Upwintrade scam was through Facebook. An account that appeared to be operated by Orlando Bell, someone I know personally, made a Facebook post about how he had purchased a new

home with the money he had made doing cryptocurrency trading with someone named David Shamlian.

4. I sent a direct message to the Orlando Bell account inquiring about the cryptocurrency trading success alluded to in the post. This person advised me to message David Shamlian on Skype. This person also reassured me about David's legitimacy through the following events. A true and correct copy of my direct messages with this account is attached as Attachment A.

5. I later confirmed with the real Orlando Bell that his Facebook account had been hacked and taken over by unknown persons before the date of the post and messages described above. A true and correct copy of my messages with the real Orlando Bell is attached as Attachment B.

6. My husband and I soon messaged David Shamlian on Skype. David advised us to create an account at www.upwintrade.com. We transferred cryptocurrency with a dollar-denominated value of \$654,609.84 to blockchain addresses provided by Upwintrade before ultimately realizing that we had been scammed.

7. My husband's Declaration in support of our Motion for Preliminary injunction provides and verifies our transaction history, our messages with David Shamlian, emails we received from Upwintrade, and screenshots of the Upwintrade platform. I have reviewed my husband's Declaration and the attached materials and verify that those attachments are true and correct copies of what they purport to be.

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8. The Defendants' scam has devastated our family financially. Our savings are depleted, and we now face an uncertain financial future. We are pursuing this litigation and cooperating with law enforcement in the hopes that some of the assets controlled by the Upwintrade scammers might be preserved for our eventual recovery.

[SIGNATURE PAGE FOLLOWS]

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VERIFICATION



I, Loni Harris, hereby verify and declare under penalty of perjury
that the foregoing is true and correct.

DocuSigned by:

2160BDBFC244421...




Loni Harris

Dated: 9/1/2024


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Orlando Bell





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**Intro**

 Agency Owner at Orlando Bell Insurance Agency




 Lives in **San Francisco, California**


 From **San Francisco, California**


 Followed by 604 people


**Photos**

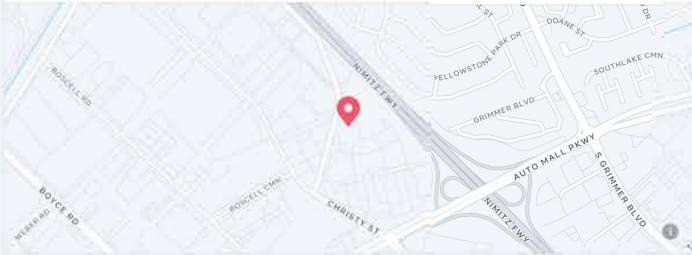
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Posts


**Orlando Bell is at Destiny Christian Fellowship.**


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 9

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Orlando Bell

Generated by Loni M Harris on Thursday, June 6, 2024 at 12:20 PM UTC-07:00
Contains data you requested from June 6, 2023 at 6:22 AM to June 5, 2024 at 12:11 PM

Loni M Harris

▶ 0:02 / 2:13 — 🔊 ⋮

May 10, 2024 5:00:43pm

Loni M Harris

Orlando missed your call.

May 10, 2024 3:59:59pm

Loni M Harris

On another note how's your project coming along?

May 09, 2024 6:08:33pm

Loni M Harris

Thanks for getting back to me. I really do appreciate it.

There was definitely a learning curve doing our first trade I think we're starting to understand the process

I know we were Just talking about how people are so dishonest. Its awful!! It's happen to our business too so i understand

May 09, 2024 6:08:09pm

Orlando Bell

I usually pay him 15% upfront from my pocket, he said they were scammed multiple times, people withdrew and not pay commission. They even block him. I don't know why people will be so greedy to do that to him and his after making money for them.

David is a really awesome person, he works with a bunch of traders which can make it difficult for him to approve your withdrawal without his team. Once you understand the whole process, you won't have to worry about a th

May 09, 2024 5:58:13pm

Loni M Harris

I am sorry I keep bugging you. We are on a time crunch.

HAR0002

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May 06, 2024 8:54:16pm

Loni M Harris

David finished the trades. He said he won't approve the withdraw unless we pay him. He doesnt want to get scammed, which is understandable. I was under the impression that we could use the money from the withdraw because who has that kind of money laying around lol. And I didn't know we'd have to come up with another la sum of money to pay David in addition to the money we already invest with him. This is why I was curious how you able to pay him BTC on your first withdrawal? Or am I not understanding this whole thing? Is there someth am missing?

May 06, 2024 8:53:14pm

Loni M Harris

How did you get access to BTC to pay David if David has to approve your wallet. I am sorry i am just confused

May 06, 2024 5:42:45pm

Loni M Harris

We want to pay him but I don't know how lol

May 06, 2024 4:28:01pm

Loni M Harris

Could you explain step by step what you did to pay David? I am a bit confused lol

May 06, 2024 4:26:18pm

Loni M Harris

Wait so you paid David BTC from your wallet? So thats what you mean by upfront?

May 06, 2024 4:25:48pm

Orlando Bell

What do you mean by a different username?

May 06, 2024 4:15:40pm

Orlando Bell

Withdrawal only goes to one account, so they are scared you might run away with funds if they let you withdraw funds before paying them

May 06, 2024 4:15:22pm

HAR0003

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Orlando Bell

It's come out of my pocket. I pay him via Btc.

May 06, 2024 4:15:08pm

Loni M Harris

Also did you have to use a different user name to pay David?

May 06, 2024 4:02:12pm

Loni M Harris

We are trying to understand how this works.

May 06, 2024 3:28:27pm

Loni M Harris

And how do you pay once he approves?

May 06, 2024 3:28:13pm

Loni M Harris

No Problem. Thanks for taking the time to answer. When you say, upfront fee does that come out of the withdrawal or you have to come out of pocket?

May 06, 2024 3:27:32pm

Orlando Bell

Hey Loni, I apologize for the delay in responding. I'm constantly swamped with work and hardly have any time myself. There's this project I'm currently working on that's consuming most of my time. The only instance when withdrawal was delayed was the very first time, and that was because it happened over the weekend. But ever other time, it went smoothly without any delays. Whenever I want to withdraw, he asks for a 15% upfront fee, we pay, and then he approves the withdrawal.

May 06, 2024 3:21:53pm

Loni M Harris

David ask me to ask you about how the process works to withdraw. Would you mind providing some input? Did he pay upfront or pay him through upwin?

May 05, 2024 8:08:32pm

Loni M Harris

HAR0004

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Hey Orlando
Can I call you. I have a quick question.

May 04, 2024 11:10:09am

Loni M Harris

Orlando missed your call.

May 04, 2024 11:10:05am

Loni M Harris

Hey Orlando. Sorry to keep bothering you. Quick question How did your first withdraw go? Were there any del

May 03, 2024 8:57:39am

Orlando Bell

Yes

Apr 24, 2024 7:20:10am

Loni M Harris

Also wanted to say that was very thought of you to gift him a very nice watch!

Apr 16, 2024 12:59:07pm

Loni M Harris

▶ 0:00 / 2:03 ——— 🔊 ⋮

Apr 16, 2024 12:54:11pm

Orlando Bell

▶ 0:00 / 0:36 ——— 🔊 ⋮

Apr 16, 2024 12:45:12pm

Loni M Harris

Also I was really curious, how did your meeting with David go last month?

Apr 15, 2024 8:42:14pm

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Loni M Harris

Hey Orlando. Do you have any idea why David changed his name to Brad Hill?

Apr 15, 2024 3:19:50pm

Loni M Harris

Thanks. We have 2 accounts too. Chase is one of the worse to transfer funds. I believe banks don't want anyone to move to Bitcoin because they can't control it. The dollar is fiat money and it's all controlled. Anyway thanks for your help. We got it worked out. Chase has been giving us a hard time

By the way, did you have a hard time withdrawing? Was it pretty simple?

Apr 12, 2024 6:52:54am

Orlando Bell

Sure, right now I actually have 2 accounts on kraken and 2 accounts on crypto.com. I had someone help me open them, you know, just in case I run into any issues with one of them, I can easily switch to the others. It's quite interesting how the banks are really trying to resist this whole thing.

Over 80 million users buy, sell, and trade Bitcoin, Ethereum, NFTs and more on Crypto.com. Join the World's largest crypto trading platform.

<https://crypto.com/>

Apr 12, 2024 6:43:16am

Loni M Harris

Hey Orlando. Are you still having issues wiring funds to Crypto? We have nothing but problems. Then we open Kraken and it's even worse. How are you able to wire without it getting rejected? What bank do you use? I may use a different bank. This is very Frustrating!

Apr 09, 2024 3:56:44pm

Orlando Bell

Hey Loni!

So, if your bank is canceling the transaction, I don't think it's crypto.com's fault. It's probably an issue with your bank. But you could also give kraken a try. I mean, they're all pretty much the same, right?

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<https://crypto.com/>

Mar 19, 2024 5:54:54am

Loni M Harris

It's frustrating when we transfer. Banks keep cancelling it.

Mar 18, 2024 8:09:19pm

HAR0006

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Loni M Harris

Hey Orlando. Do you use Crypto .com or Kraken?

Mar 18, 2024 8:08:44pm

Loni M Harris

I know! It's so incredible to see this! We have to transfer smaller amounts like everyone other day so it would go through. Just yesterday the bank stopped the transfer again but we had to call and say it was us.

Mar 08, 2024 2:48:24pm

Orlando Bell

I told you he is absolutely amazing at what he does. I mean, his prediction last year about crypto hitting 70-80k now... It's just mind-blowing how accurate he was! I have to admit, I was a bit skeptical at first, but once I got involved, I was completely blown away by the incredible growth that I've been witnessing. Seriously, The profit making right now is beyond anything I could have ever imagined. It's just so incredible, it's hard to put into words.

Mar 08, 2024 2:19:02pm

Orlando Bell

Oh, I also had a bit of a hiccup with my bank during my last transfer. It was quite a hassle because the amount was pretty hefty and it was an online transfer. But everything got sorted out eventually.

Mar 08, 2024 2:18:18pm

Loni M Harris

We finally got it to work. They were canceling bc there was a lot of fraudulent activities going on. When I found BlackRock (my former employer) got in the bitcoin space then I knew we were in to something. David has been kept in the loop. You're right he is very knowledgeable. Thank you for referring him!

You're got in at the right time!

Mar 02, 2024 10:19:12am

Orlando Bell

Oh no, that's not good! I've never come across that situation before. Have you managed to solve it yet? As for the accent, I'll just wait until I meet him in person this month to ask him about it. I'm really curious to know where he has that accent from! Haha, it's been on my mind. 😊

Mar 02, 2024 9:38:11am

Loni M Harris

By the way David has a strong African accent. Online shows he's white though lol.

HAR0007

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Feb 29, 2024 7:51:20am

Loni M Harris

Well that's a relief!

Problem is we can't transfer more than \$10k a day to trade. It's frustrating! David probably thinks we're playing games. First few times it kept getting cancelled so we tried \$10k and that worked but he can't trade with that 🤔 frustrating!!

Feb 29, 2024 6:29:06am

Orlando Bell

Oh, no way! David? He's definitely not involved in any scam,lol! he's got a real knack for understanding the market and predicting what's gonna happen in the future. Trust me, he's really good at it. I can't say I'm having the best right now, it's all business purpose

Feb 29, 2024 1:30:59am

Loni M Harris

Appreciate you getting back to me Orlando. I wanted to make sure this wasn't a scam lol. Hope you're having fun traveling. Thanks again for sharing your input and advise! Much appreciated! Safe travels!

Feb 27, 2024 7:32:08am

Orlando Bell

I thought I'd give you my personal email so you can easily reach out to me whenever you need. Here it is Orlandobell17@hotmail.com Feel free to drop me a line anytime!

Feb 27, 2024 6:02:58am

Orlando Bell

▶ 0:00 / 0:22 ————— 🔊 ⋮

Feb 27, 2024 6:02:43am

Loni M Harris

Hey can I call you instead of going back and forth on chat?

Feb 25, 2024 8:07:18am

Loni M Harris

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I'm feel alittle better knowing you have a relationship with him. Are you meeting with him in Dubai?

Feb 25, 2024 7:45:29am

Loni M Harris

Ok thanks! Im comfortable but I think having a stranger trade can be nerve racking lol. And just like you trust Ji trust him because of you. He mentioned he had a software but never mentioned anything about how he traded

Curious where did you end up buying your home? We're thinking of moving out of the Bay Area

Feb 25, 2024 7:41:19am

Orlando Bell

Just a piece of advice for you, if you're not comfortable with it, then don't start doing it. In this case, I didn't hav formal agreement because my friend Justin has been trading with him for years now. I've actually withdrawn m money before and I trust him. I'll be meeting up with him on the 10th of next month. He's got this software that connects to my account,so he doesn't have access to my account.

Feb 25, 2024 7:26:47am

Loni M Harris

Well it concerns me that I've just transferred \$ to my account and I'm about to start having a stranger trade usi money and his Facebook account disappeared. This makes me nervous

But we do have his Skype but he never mentioned his FB is gone. 🤔

Also when he started trading for you how did you get started. Was there an agreement you had to sign? And h was he able to trade from your account?

Feb 25, 2024 6:52:06am

Orlando Bell

Yeah. I actually mentioned earlier that he messaged me yesterday about that. Are you having trouble getting in with him?

Feb 25, 2024 6:39:45am

Orlando Bell

You're welcome! Apparently he's been at it for quite a while now. Business is actually doing pretty well! I've got amazing team of hardworking folks who have been giving it their all. Things are going super smoothly.

♥️Loni M Harris

Feb 25, 2024 6:39:17am

Loni M Harris

Hey Orlando. It looks like David profile no longer exist. Did he tell you that?

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Feb 24, 2024 9:11:22pm

Loni M Harris

Oh gotcha! Thanks for the info! We spoke to him on Skype. Seems like he's been doing this while.

On another note, how are you doing? How's the insurance business?

Feb 24, 2024 11:46:00am

Orlando Bell

So I had to call him today on Skype for confirmation

Feb 24, 2024 11:29:39am

Orlando Bell

No it was this morning he sent me the message on Skype, because we communicated last night on facebook before going to bed.

Feb 24, 2024 11:29:17am

Loni M Harris

Did he get hacked?!

Feb 24, 2024 11:25:10am

Loni M Harris

We communicate with him yesterday. Seems to be ok then. Was this message yesterday? This is concerning

Feb 24, 2024 11:22:29am

Orlando Bell

I woke up to a message from him on Skype! Apparently, he's having a bit of trouble accessing his Facebook account. He asked me to do him a favor and not pay any attention to any messages from there for the time being. Have managed to reach out to him?

Feb 24, 2024 11:04:25am

Orlando Bell

Hey, sorry for the delayed response! I've been swamped lately. Yes it's very exciting and you'll get to experience yourself! If he happens to mention that the market isn't doing so well, I'd recommend steering clear. But if he says the market is looking great, then go ahead and go with his advice. Trust me, it's gonna be awesome!

Feb 24, 2024 11:03:25am

HAR0010

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Loni M Harris

did this all happen since Sept?

Feb 22, 2024 3:05:51pm

Loni M Harris

That sounds exiting! Thank you for sharing

Feb 22, 2024 3:05:32pm

Orlando Bell

When he's less busy he will definitely get back to you. My first trading experience was quite exciting! I began w bitcoin, valued at 29k at that time. Whenever he mentioned that the market was favorable, I added more funds initial deposit. Eventually, I made my first withdrawal, which was such a thrilling moment for me! As for my current trades, I've decided to start with larger amounts.

Feb 22, 2024 2:11:06pm

Loni M Harris

Well I know you would invest with just anyone so I trust you made the absolute right decision. And that's what caught my attention. We asked to set up a call but he must be very busy. Thinking of starting with 1 coin. Is that how you started?

Feb 22, 2024 1:39:44pm

Orlando Bell

It's awesome to mix things up with your money. Not putting all your eggs in one basket, But seriously, I've never come across anything quite like this before. It's pretty mind-blowing,

Feb 22, 2024 1:36:53pm

Loni M Harris

We've been focused on Real Estate but want to diversify

Feb 21, 2024 3:16:34pm

Loni M Harris

That's what he said! I guess last experience made me nervous lol

Feb 21, 2024 3:16:08pm

Orlando Bell

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Yes lol just try him you will see it yourself

Feb 21, 2024 2:51:33pm

Loni M Harris

Thank you for that info. So you'd say David is pretty legit lol

Feb 21, 2024 2:32:47pm

Orlando Bell

It was my friend Justin that introduced him to me and Justin have been wining for quite some time now

Feb 21, 2024 2:17:28pm

Loni M Harris

Btw the the way where did you end up buying? I'm so happy for you and your accomplishments!

Feb 21, 2024 7:52:11am

Loni M Harris

Thanks for getting back to me. I've contacted David as well. I just had a bad experience when I invested in Bitc yrs ago so I'm a little nervous. How did you meet him?

Feb 21, 2024 7:51:19am

Orlando Bell

I'm not sure if there's a referral bonus, but I can check with my friend Justin to see if he received one when I withdrew my money. If he did, then I'm definitely going to be making some extra cash because three of my frien have already started investing with him. Hahaha

Feb 21, 2024 7:20:58am

Loni M Harris

Hey Orlando. Congratulations on your new home! Are you getting a commission whenever you refer someone David?

Feb 20, 2024 5:09:46pm

HAR0012

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Orlando Bell

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Orlando Bell

It is not. Orlandowbell@gmail.com

👍 Loni M Harris

May 22, 2024 1:52:57pm

Loni M Harris

Sorry one more question. Is this your email address: Orlandobell17@hotmail.com

May 22, 2024 1:41:56pm

Loni M Harris

ok thanks!

May 22, 2024 1:31:37pm

Orlando Bell

I do not know them

May 22, 2024 1:31:29pm

Loni M Harris

One more question, So you do know anyone by the name of Justin Mcknight and David Shamlian?

May 22, 2024 1:30:50pm

Loni M Harris

ok thanks

May 22, 2024 1:24:39pm

Orlando Bell

No I do not. My FB was hacked. I had to open another one.

May 22, 2024 1:24:27pm

Loni M Harris

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There was a post that said you bought a house using Crypto

May 22, 2024 1:22:43pm

Loni M Harris

Did you ever invest in crypto ?

May 22, 2024 1:22:21pm

Orlando Bell

What's your question?

May 22, 2024 1:21:48pm

Orlando Bell

Hi Loni, I will check the email

May 22, 2024 1:21:40pm

Orlando Bell

You can now message and call each other and see info like Active Status and when you've read messages.

May 22, 2024 1:21:19pm

Loni M Harris

HI Orlando. I sent you an email. But I have a quick question for you.

May 22, 2024 1:12:31pm